

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,)	
)	CASE NUMBER: <u>3:19-cr-30022-SMY</u>
Plaintiff,)	
)	18 USC § 922(g)
vs.)	18 USC § 924(c)(1)(A)
)	18 USC § 1956(a)(3)(B)
DAVID BANUELOS,)	21 USC § 841(a)(1)
ALEX MOLINA,)	21 USC § 841(b)(1)(A)(viii)
GREG BLACK,)	21 USC § 841(b)(1)(B)(ii)(II)
RONALD SCHWEPPE,)	21 USC § 841(b)(1)(B)(viii)
)	21 USC § 841(b)(1)(C)
Defendants.)	21 USC § 846

SUPERSEDING INDICTMENT

The Grand Jury charges:

COUNT 1

**CONSPIRACY TO DISTRIBUTE AND POSSESS WITH INTENT TO DISTRIBUTE CONTROLLED
SUBSTANCES**

From an unknown date but at least on or about October 1, 2015, and continuing until on or about June 19, 2018, in Madison County, Illinois, within the Southern District of Illinois, and elsewhere,

**DAVID BANUELOS,
ALEX MOLINA,
GREG BLACK, and
RONALD SCHWEPPE**

defendants herein, did conspire and agree with each other and others, both known and unknown to the grand jury, to knowingly and intentionally distribute and possess with intent to distribute controlled substances, to wit, methamphetamine, a Schedule II Controlled Substance, and cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1). All in violation of Title 21, United States Code, Section 846.

FILED

DEC 10 2019

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS OFFICE

The total amount of methamphetamine, a Schedule II Controlled Substance, involved in the conspiracy that was reasonably foreseeable to **DAVID BANUELOS**, **ALEX MOLINA**, and **GREG BLACK** was 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(viii), and 846.

The total amount of cocaine, a Schedule II Controlled Substance, involved in the conspiracy that was reasonably foreseeable to **DAVID BANUELOS**, **ALEX MOLINA**, **GREG BLACK**, and **RONALD SCHWEPPE** was 500 grams or more of a mixture or substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(ii)(II), and 846.

Before **DAVID BANUELOS** committed the offense charged in this count, he was convicted of the offense of Conspiracy to Distribute Cocaine under federal law, a serious drug felony, in the United States District Court for the Northern District of Illinois, Case Number 1:04-cr-00886, on October 10, 2006, for which **DAVID BANUELOS** served a term of imprisonment of more than 12 months for said offense, and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

Before **ALEX MOLINA** committed the offense charged in this count, he was convicted of the offense of Conspiracy to Distribute Cocaine under federal law, a serious drug offense, in the United States District Court for the Southern District of Illinois, Case Number 3:09-cr-30100, on November 22, 2010, for which **ALEX MOLINA** served a term of imprisonment of more than 12 months for said offense, and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

Before **GREG BLACK** committed the offense charged in this count, he was convicted of the offense of Distribution of Cocaine Base under federal law, a serious drug offense, in the United

States District Court for the Southern District of Illinois, Case Number 3:07-cr-30017, on July 27, 2007, for which **GREG BLACK** served a term of imprisonment of more than 12 months for said offense, and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

Before **RONALD SCHWEPPE** committed the offense charged in this count, he was convicted of the offense of Conspiracy to Possess with Intent to Distribute and Distribute Controlled Substances, under federal law, a serious drug offense, in the United States District Court for the Southern District of Illinois, Case Number 3:02-cr-30081, on June 1, 2004, for which **RONALD SCHWEPPE** served a term of imprisonment of more than 12 months for said offense, and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

COUNT 2

POSSESSION WITH INTENT TO DISTRIBUTE METHAMPHETAMINE

On or about February 6, 2018, in Madison County, Illinois, within the Southern District of Illinois, and elsewhere,

ALEX MOLINA,

defendant herein, did knowingly and intentionally possess with intent to distribute more than 500 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(viii).

Before **ALEX MOLINA** committed the offense charged in this count, he was convicted of the offense of Conspiracy to Distribute Cocaine under federal law, a serious drug offense, in the United States District Court for the Southern District of Illinois, Case Number 3:09-cr-30100, on November 22, 2010, for which **ALEX MOLINA** served a term of imprisonment of more than 12

months for said offense, and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

COUNT 3

POSSESSION WITH INTENT TO DISTRIBUTE METHAMPHETAMINE

On or about July 16, 2018, in Madison County, Illinois, within the Southern District of Illinois, and elsewhere,

GREG BLACK,

defendant herein, did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C).

COUNT 4

POSSESSION OF A FIREARM IN FURTHERANCE OF A DRUG TRAFFICKING CRIME

From between on or about November 16, 2017, and on or about July 16, 2018, in Madison County, Illinois, within the Southern District of Illinois,

GREG BLACK,

defendant herein, during and in relation to a drug trafficking crime, which crime may be prosecuted in a court of the United States, that is, a violation of Title 21, United States Code, Sections 841 and 846, namely the offense described in Count One of this Indictment, did knowingly possess in furtherance of such crime a firearm, namely a Colt Army, .357 Caliber, Serial Number SA36400, in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 5

POSSESSION OF A WEAPON BY A FELON

From between on or about November 16, 2017, and on or about July 16, 2018, in Madison County, Illinois, within the Southern District of Illinois, and elsewhere,

GREG BLACK,

defendant herein, knowingly possessed a firearm in and affecting commerce, that is, a Colt Army, .357 Caliber, Serial Number SA36400, having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, namely Distribution of a Controlled Substance in the United States District Court for the Southern District of Illinois, Case Number 3:07-cr-30017-MJR, on July 27, 2007, and knowing that he had been convicted of such a crime, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT 6

LAUNDERING OF MONEY INSTRUMENTS (STING PROVISION)

On or about April 9, 2018, in Saint Clair County, Illinois within the Southern District of Illinois, and elsewhere,

DAVID BANUELOS,

defendant herein, with the intent to conceal and disguise the location, source, ownership and control, of property believed to be the proceeds of specified unlawful activity, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce involving property represented by a person at the direction of, and with the approval of, a federal official authorized to investigate violations of Title 18, United States Code, Section 1956, to be proceeds of specified unlawful activity, to wit: conspiracy to distribute controlled substances and distribution of controlled substances, in violation of Title 21 United States Code, Sections 841 and 846, which financial transaction involved a wire transfer in the amount of \$2,000 via MoneyGram transaction number 93408614 to A.D. represented to be proceeds of the distribution of controlled substances. All in violation of Title 18, United States Code, Sections 1956(a)(3)(B), 2.

COUNT 7

LAUNDERING OF MONEY INSTRUMENTS (STING PROVISION)

On or about June 19, 2018, in Saint Clair County, Illinois within the Southern District of Illinois, and elsewhere,

DAVID BANUELOS,

defendant herein, with the intent to conceal and disguise the location, source, ownership and control, of property believed to be the proceeds of specified unlawful activity, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce involving property represented by a person at the direction of, and with the approval of, a federal official authorized to investigate violations of Title 18, United States Code, Section 1956, to be proceeds of specified unlawful activity, to wit: conspiracy to distribute controlled substances and distribution of controlled substances, in violation of Title 21 United States Code, Sections 841 and 846, which financial transaction involved a wire transfer in the amount of \$500 via MoneyGram transaction number 92924253 to A.D. represented to be proceeds of the distribution of controlled substances. All in violation of Title 18, United States Code, Sections 1956(a)(3)(B), 2.

COUNT 8

Distribution of Methamphetamine

On or about July 30, 2018, in St. Clair County, Illinois, within the Southern District of Illinois,

RONALD SCHWEPPE,

defendant herein, did knowingly and intentionally distribute 5 grams or more of methamphetamine, a Schedule II Controlled Substance. All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(viii).

Before **RONALD SCHWEPPE** committed the offense charged in this count, he was convicted of the offense of Conspiracy to Possess with Intent to Distribute and Distribute Controlled Substances, under federal law, a serious drug offense, in the United States District Court for the Southern District of Illinois, Case Number 3:02-cr-30081, on June 1, 2004, for which **RONALD SCHWEPPE** served a term of imprisonment of more than 12 months for said offense,

and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

COUNT 9

POSSESSION WITH INTENT TO DISTRIBUTE METHAMPHETAMINE

From on or about January 8, 2019, until on or about January 9, 2019, in St. Clair County, Illinois, within the Southern District of Illinois, and elsewhere,

RONALD SCHWEPPE,

defendant herein, did knowingly and intentionally possess with intent to distribute more than 50 grams of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(viii).

Before **RONALD SCHWEPPE** committed the offense charged in this count, he was convicted of the offense of Conspiracy to Possess with Intent to Distribute and Distribute Controlled Substances, under federal law, a serious drug offense, in the United States District Court for the Southern District of Illinois, Case Number 3:02-cr-30081, on June 1, 2004, for which **RONALD SCHWEPPE** served a term of imprisonment of more than 12 months for said offense, and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

FORFEITURE ALLEGATIONS

Upon conviction of the offenses alleged in Counts 4 and/or 5 of this Superseding Indictment,

GREG BLACK,

shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearm or ammunition involved in the aforementioned offenses, including, but is not limited to, the following: **a Colt Army firearm,**

.357 Caliber, Serial Number SA36400, and any and all ammunition contained therein or seized therewith.

A TRUE BILL



A handwritten signature in blue ink, appearing to read 'D. Wiseman', written over a horizontal line.

DEREK J. WISEMAN
Assistant United States Attorney

A handwritten signature in blue ink, appearing to read 'S. Weinhoeft', written over a horizontal line.

STEVEN D. WEINHOEFT
United States Attorney

Recommended Bond: Detention